

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
CENTRAL DIVISION**

**ZACKARY RILEY, in his capacity,
and as representative of the estate of:
ROSEMARY E. SCOTT,
f/k/a ROSEMARY E. RILEY,**

Plaintiff,

vs.

Case No. 2:15-cv-04294

**HANNIBAL REGIONAL HOSPITAL,
HANNIBAL REGIONAL HEALTHCARE
SYSTEM, HANNIBAL CLINIC,
BLESSING HOSPITAL, LANDMARK
HOSPITAL, LANDMARK MANAGEMENT
SERVICES OF FLORIDA, LLC, UNIVERSITY
OF MISSOURI HOSPITAL, CURATORS OF
THE UNIVERSITY OF MISSOURI,
BARNES-JEWISH HOSPITAL,
BJC HEALTHCARE and
JOHN DOES 1 THROUGH 120,**

Defendants.

**DEFENDANTS HANNIBAL REGIONAL HEALTHCARE SYSTEM AND
HANNIBAL REGIONAL HOSPITAL'S NOTICE TO TAKE DEPOSITION**

TO: Counsel of Record

DATE: Friday, December 23, 2016

TIME: 9:00 a.m.

PLACE: Law Offices of Brinker & Doyen, LLP
34 N. Meramec Ave., 5th Floor
Clayton, MO 63105

**WITNESS TO
BE DEPOSED:** Stephen E. Godfrey, M.D.

PLEASE TAKE NOTICE that at the above date, hour and place, we shall cause the deposition of the above witness to be taken upon oral examination pursuant to Rule 57.03 of the

Missouri Rules of Civil Procedure, before a shorthand reporter and suitable notary public. If not completed on that day, said deposition will be continued from day to day, at the same place, until completed. Any party or their attorney may appear and participate as they see fit.

The witness shall bring the following materials with him at the time of his deposition:

1. Any and all writings, notes, memoranda, graphs, charts, photographs, drawings, videotapes, audio tapes, and any other materials that have been utilized to form any theories and/or opinions in this matter.
2. A copy of any document, report, medical record, testing or x-ray which relate or refer to Rosemary Scott or any other matters relating to the lawsuit.
3. Copies of any notes made by the deponent or provided to the deponent by anyone which relate or refer to Rosemary Scott, f/k/a Riley or any other matters relating to this lawsuit.
4. Any photographs taken by the deponent or provided to the deponent which relate to Rosemary Scott, f/k/a Riley or any other matters relating to this lawsuit.
5. Any deposition transcripts provided to the deponent by anyone which relate or refer to Rosemary Scott, f/k/a Riley or any other matters relating to this lawsuit.
6. Any diagrams, drawings or charts made by the deponent or provided to the deponent by anyone which relate or refer to Rosemary Scott, f/k/a Riley or any other matters relating to this lawsuit.
7. Any statement taken by the deponent or provided to the deponent which relate or refer to Rosemary Scott, f/k/a Riley or any other matters relating to this lawsuit.
8. Any memoranda made by the deponent or provided to the deponent which relate or refer to Rosemary Scott, f/k/a Riley or any other matters relating to this lawsuit.

9. Any correspondence between the deponent and any persons, including the attorney for the plaintiff and between third parties which relate or refer to Rosemary Scott, f/k/a Riley or any other matters relating to this lawsuit.

10. Any documents prepared by the deponent, provided to the deponent, obtained by the deponent, or reviewed by the deponent whether intended for him or not, which relate or refer to Rosemary Scott, f/k/a Riley or any other matters relating to this lawsuit.

11. Any correspondence, including but not limited to e-mails to or from Zackary Riley.

12. All literature or other reference material or information consulted by the deponent in connection with this litigation whether found to be relevant or helpful or not.

13. All documents or other tangible things which the deponent considers relevant to his assignment, investigation or opinions in this case.

14. All documents prepared by the deponent which illustrate or demonstrate any fact or opinion considered relevant to the case and/or his assignment, investigation or opinion.

15. Copies of the witness' curriculum vitae.

16. All invoices or bills for services rendered by the deponent in connection with this lawsuit.

17. The deponent's entire file created or maintained in connection with any analysis of any matter at issue in this litigation.

18. Printed copies of all electronic communications to or from the deponent in any way relating to this matter.

NEWMAN, COMLEY & RUTH P.C.



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**ATTORNEYS FOR DEFENDANTS
HANNIBAL REGIONAL HOSPITAL
AND HANNIBAL REGIONAL
HEALTHCARE SYSTEM**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 15th day of December, 2016, a true and accurate copy of the foregoing was filed with the Court using the Court's CM/ECF system and was served upon each attorney of record via ECF notification.

